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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047
Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**JOINT STATEMENT OF THE ISSUES
REGARDING META DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

1 Counsel for Meta Platforms, Inc. and Instagram, LLC (collectively “Meta”); Hartford Casualty
2 Insurance Company and Sentinel Insurance Company, Ltd. (collectively “Hartford”); and Federal
3 Insurance Company (“Federal” and together with Hartford, the “Insurers”) met and conferred by
4 Zoom on January 15, 2025 at 3pm PT pursuant to this Court’s Order Deferring Ruling on [1504]
5 Administrative Motion to Relate. Dkt No. 1531. Martin Myers, Heather Habes, and Nia Joyner joined
6 on behalf of Meta; Matthew Antonelli, James Ruggeri, Sean Kelly, and Sara Hunkler joined on behalf
7 of Hartford; and Susan Sullivan, Daniel Horowitz, and Blair Kaminsky joined on behalf of Federal.

8 Counsel discussed the issues presented in Meta’s Administrative Motion to Relate and the
9 Insurers’ Oppositions. Meta further confirmed that it would submit a response to the Oppositions as
10 ordered, following client approval. Meta outlined the bases for its planned response to the
11 Oppositions. Specifically, Meta contended that it timely personally served Insurers’ respective
12 registered agents with the Motion to Relate, Complaint, Summons, and other originating documents on
13 January 8, 2025. Insurers stated that they could not confirm that service was received. At Insurers’
14 request, Meta agreed to send additional copies of proofs of service via email, and Meta has done so.
15 With respect to whether the Coverage Action should be related to the MDL, the parties maintained the
16 positions set forth in the Motion to Relate (ECF No. 1504) and Oppositions (ECF Nos. 1521 and
17 1526).

18 Hartford and Federal believe the Court should defer consideration of the Motion to Relate
19 (which they contend was not served in accord with Local Rules) until the parties’ forum dispute is
20 resolved. Today, Hartford filed a motion to remand the first-filed Delaware action (Case No. 1:24-cv-
21 01422-MN) and expects in the next two weeks to file a motion to dismiss or stay Meta’s second-filed
22 California action (Case No. 4:24-cv-09500-LB). Federal anticipates submitting joinders to such
23 motions. However, should the Court proceed to hear the Motion to Relate, Hartford requests the Court
24 to order Meta to serve its reply to the oppositions on a date certain before that hearing. During the
25 parties’ meet and confer, Meta’s counsel advised that Meta intends, as ordered, to file a reply but
26 would not commit to filing it before the hearing.

27 Counsel for Federal is unavailable for the Case Management Conference currently scheduled for
28 Friday, January 17, 2025. Accordingly, earlier today, Federal submitted a request to the Court to reset the

1 hearing date with respect to the Administrative Motion. Hartford has no objection to Federal's request.
2 Counsel for Meta is ready and available to appear before the Court on Friday, January 17, 2025 during the
3 scheduled Case Management Conference.
4

5 DATED: January 16, 2025

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By: /s/ Heather W. Habes

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